

EXHIBIT A

deBettencourt, Justin D.

From: Simon Sandoval-Moshenberg <simon@justice4all.org>
Sent: Thursday, October 13, 2016 5:00 PM
To: deBettencourt, Justin D.
Cc: Dingman, Michael S.; Nady Peralta
Subject: Re: Giron De Reyes, et al. v. Waples Mobile Home Park LP, et al., No. 1:16-cv-563 (E.D.Va.)

FilingDate: 10/13/2016 9:01:00 PM

Yes, that's right.

On Oct 13, 2016, at 4:33 PM, deBettencourt, Justin D. <jdebettencourt@ReedSmith.com> wrote:

Hi Simon:

The parties met and conferred on documents that exist which are responsive to Defendants' RFPs 7-8 (female and male plaintiffs). You indicated that you would get back to us on which documents exist that are responsive to those RFPs. Per our conversation on Tuesday October 11, 2016, we understand the following documents exist with regards to RFPs 7-8:

Yovanna Solis – tax returns

Rosy Reyes – criminal background check (already provided to Defendants); and tax returns

Rosa Amaya – tax returns; and Rosa can recall opening up a bank account with a passport prior to getting an ITIN

Ruth Rivas – tax returns; criminal background check (not in Plaintiffs' possession, custody or control); lease (not in Plaintiffs' possession, custody or control); TD Bank Account Application (which Plaintiffs are looking into getting and will agree to produce subject to the Protective Order if they can acquire)

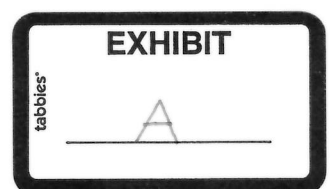
It is our understanding that on the basis of Plaintiffs' objections, Plaintiffs are continuing to withhold a) the tax returns that reference the female plaintiffs' ITIN numbers; and b) the tax returns the female plaintiffs submitted to acquire their ITINs.

Please let us know if the representations in this email are accurate.

Thanks,
Justin

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